



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

Mr. Edward T. Bresnan, Esquire
Solicitor
Borough of Ambler
P. O. Box 180
Blue Bell, PA 19422

SEP 30 1988

Dear Mr. Bresnan:

Thank you for your letter of September 23, 1988, concerning the Record of Decision (ROD) for the Ambler Asbestos Superfund site. Your letter requests that EPA delay signing the ROD so that additional consideration can be given to alternative remedial cleanup technologies. I understand the Borough's concerns on this matter; however, I believe I can suggest a process that will address these concerns yet allow EPA to proceed with the ROD.

During the September 22, 1988 meeting between the Borough Council and EPA, we expressed our willingness to work with your consultant during the design stage, after ROD signature, to explore other remedial cleanup technologies. Furthermore, we stated that if another technology is found to be more appropriate for the Ambler site than the one currently described in the ROD, we would be willing to re-use the ROD and recommend that technology. Let me assure you that I am personally committed to this approach.

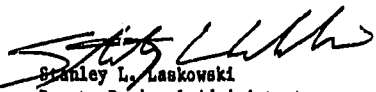
You state in your letter that EPA has admitted that the Remedial Investigation and Feasibility Study (RIFS) is inadequate. I would like to clarify this issue. EPA feels that the RIFS for Ambler fully supports the remedy selected in the ROD. We concede that the feasibility study should have provided more detail on the alternative technologies that were considered for the site. Following the June 16, 1988 public meeting and upon your recommendation, EPA met with at least four contractor firms in order to give further consideration to potential alternative solutions. As I have stated previously, I am receptive to having future meetings with the Borough's consultant in order to continue evaluating alternative technologies, or to listen to any other concerns that might be identified by the Borough. In addition, EPA assistance is available in the form of a technical assistance grant to any citizen group that meets the requirements for the grant. This would enable any eligible citizen organization in Ambler (local government bodies are not eligible for these grants) to hire technical experts to review and comment on EPA site-related documents. Nanci Sinclair of my staff can be contacted at 215-597-4164 for more information on grants.

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I have decided to sign the ROD for several important environmental and management reasons. First, Congress reduced fiscal year 1989 extramural funds for Superfund by 210 million dollars. As a result, we have more potential construction starts nationally at Superfund sites that we have funds available to support them. If the Ambler ROD is not signed in fiscal year 1988, we may lose our ability to start any construction in fiscal year 1989, and possibly even through fiscal year 1990 (depending on what Congress does with our fiscal year 1990 budget). This would even affect our ability to quickly remedy the erosion and landsliding problems referenced in your letter. Second, both EPA and the Borough agree that the current ROD remedy is acceptable and desirable to enhance protection of public health, if only as an interim measure. My signing the ROD will enable work to begin, but in no way will jeopardize my commitment to you to evaluate other potential treatment technologies. Finally, EPA would have difficulty conducting any substantive negotiations with responsible parties unless a signed ROD were in place.

I appreciate the issues you have raised in your letter and I believe that we can work together to resolve them. I would be willing to meet with you in Philadelphia at your earliest convenience. Should you have any further questions, please don't hesitate to contact me.

Sincerely,



Stanley L. Laskowski
Deputy Regional Administrator

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